

Gregory A. Miles, Esq.
Nevada Bar No. 4336
ROYAL & MILES LLP
1522 W Warm Springs Road
Henderson, NV 89014
Telephone: 702-471-6777
Facsimile: 702-531-6777
gmiles@royalmilesllp.com
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

United States of America.,

Plaintiff,

vs.

Case No: 2:23-cv-00127-JCM-DJA

Leon W. Lipson, in his capacity as Personal
Representative of the Estate of Jean Lipson;
Leon W. Lipson, in his capacity as Trustee of
the Jean Lipson Trust; Nadine Lipson, in her
capacity as Trustee of the Jean Lipson Trust;
Nadine Lipson, in her capacity as Personal
Representative of the Estate of David E. Lipson;
Nadine Lipson, individually,

Defendants.

STIPULATION TO EXTEND TIME TO
FILE REPLY TO OPPOSITION TO
DEFENDANTS' SECOND MOTION
FOR SUMMARY JUDGMENT
(First Request)

Pursuant to LR IA 6-1, Plaintiff the United States of America and Defendants Leon W. Lipson, in his capacity as Personal Representative of the Estate of Jean Lipson and in his capacity as a Trustee of the Jean Lipson Trust, and Nadine Lipson, individually and in her capacity as Personal Representative of the Estate of David E. Lipson (collectively, the "Parties"), stipulate and move the Court to extend by one week the deadline for Defendants to reply to the United States' Response to Defendants' Section Motion for Summary Judgment, which was filed on November 22, 2024. *See* Dkts. 41 (Defendants' Second Motion for

1 Summary Judgment); 47 (United States' Response to Defendants' Section Motion for Summary
2 Judgment).

3 This is Defendants' first request for an extension of deadline with respect to the pending
4 summary judgment motion, and it is made before the expiration of the deadline. Defendants
5 seek only to extend the deadline for the Defendants to file a reply to United States' Response to
6 Defendants' Section Motion for Summary Judgment. The current deadline for Defendants'
7 reply to the response is December 6, 2024.
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9 Defendants do not seek the requested extension to hinder or delay this action. Rather, the
10 extension is sought in good faith and to take into account the intervening holidays in November
11 and December, as well as the long-planned family vacation of Defendants' counsel in early
12 December. The requested extension will allow Defendants to prepare a more complete and
13 appropriate reply. One additional week is necessary to allow Defendants to prepare a more
14 complete and appropriate reply. The United States does not oppose the Defendants' requested
15 extension.
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1 For the above reasons, and for good cause shown, the Parties therefore seek that the
2 current deadline for Defendants' reply in support of its Second Motion for Summary Judgment
3 be extended by one week to December 13, 2024.
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5 Respectfully submitted this 26th day of November, 2024,

6 DAVID A. HUBBERT
Deputy Assistant Attorney General

ROYAL & MILES LLP

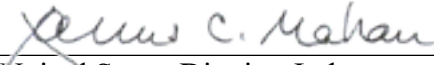
7 */s/ Yen Jeannette Tran*

/s/ Gregory A. Miles

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9 YEN JEANNETTE TRAN
TIMOTHY J. HUETHER
10 Trial Attorneys, Tax Division
US Department of Justice
11 P.O. Box 683
Washington, DC 20044
12 Phone: (202) 616-3366 (Tran)
13 (202) 307-2124 (Huether)
Fax: (202) 307-0054
14 Email: Y.Jeannette.Tran@usdoj.gov
Timothy.Huether@usdoj.gov
15 *Attorneys for Plaintiff*

Gregory A. Miles, Esq.
Nevada Bar No. 4336
1522 W Warm Springs Road
Henderson, NV 89014
Phone: 702-471-6777
Fax: 702-531-6777
Email: gmiles@royalmileslaw.com
Attorneys for Defendants

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17 IT IS SO ORDERED:

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20 United States District Judge
Dated: December 2, 2024
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